

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PROXENSE, LLC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 6:21-cv-00210-ADA
	)	
SAMSUNG ELECTRONICS CO., LTD. and	)	<b>JURY TRIAL DEMANDED</b>
SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	

**DECLARATION OF JASON WILLIAMS IN SUPPORT OF SAMSUNG’S OPPOSED  
MOTION FOR LEAVE TO AMEND INVALIDITY CONTENTIONS**

I, Jason Williams, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Defendant Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts in this declaration and, if called upon to do so, could and would testify competently as to the matters set forth herein.

2. During fact discovery, Samsung pursued additional documents and materials regarding the Pocket Vault system, but did not begin receiving access to additional Pocket Vault materials until mid-May in 2022. After obtaining access, Samsung immediately began reviewing the materials.

3. Attached hereto as Exhibit A is a draft of its proposed amended invalidity charts for the Pocket Vault system Samsung sent to Proxense on July 8, 2022.

4. Attached hereto as Exhibit B is a draft of its proposed amended invalidity charts for the new references introduced based on PTAB’s decision on February 28, 2022.

5. Attached hereto as Exhibit C is the email Samsung sent to Proxense on June 30, 2022, asking if Proxense would consent to Samsung's amending its invalidity contentions. In July 2022, Samsung met and conferred with Proxense regarding its motion for leave to amend invalidity contentions. Proxense stated it would oppose Samsung's motion.

6. Attached hereto as Exhibit D are the subpoenas on three Pocket Vault inventors – Stuart Lipoff, Todd Burger, and Brad Friedlander Samsung served on July 26, 2022. The depositions of the Pocket Vault inventors took place at the end of July and the beginning of August 2022.

7. Attached hereto as Exhibit E is the discovery dispute chart parties submitted to this Court on July 28, 2022.

8. Attached hereto as Exhibit F is Proxense's Proposed Claim Constructions.

9. Attached hereto as Exhibit G is Samsung's email to Proxense sent on June 8, 2022 to Proxense with courtesy copies of the *ex parte* reexaminations requests.

10. Attached hereto as Exhibit H are Samsung's Final Infringement Contention, served on March 7, 2022.

11. Attached hereto as Exhibit I is Samsung's email to Proxense sent on July 8, 2022 serving the amended invalidity charts (Exhibit A and Exhibit B to this Declaration).

12. Attached hereto as Exhibit J is the *Ex Parte* Reexamination Filing Data published by the USPTO as of September 30, 2020.

13. Attached hereto as Exhibit K is Samsung's Proposed Claim Constructions, served on September 31, 2021.

14. Attached hereto as Exhibit L is true and correct excerpt of the transcript of Todd Burger deposition held on July 29, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 6, 2022, in Seoul, South Korea.

/s/ **Jason Williams**

Jason Williams